



Homes  
England

Date: 8 July 2020

Our Ref: RFI2992

Tel: 0300 1234 500

Email: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

Making homes happen

██████████  
By Email Only

Windsor House  
Homes England – 6<sup>th</sup> Floor  
50 Victoria Street  
London  
SW1H 0TL

Dear ██████████

**RE: Request for Information – RFI2992**

Thank you for your recent email, which was processed under the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR).

For clarification, you requested the following information:

*Please provide me with any information on the copy of the Housing Infrastructure Fund Bid (HIF) for Otterpool Park made by Kent County Council on behalf of Shepway District Council in late 2017.*

*It is known Homes England issued a template which can be found here:*

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/885012/RFI2971 - HIF Bid Templates.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/885012/RFI2971_-_HIF_Bid_Templates.pdf) - (see attached)

*It is this submitted copy made by Kent County Council the applicant is requesting for any information on, along with any appendices, maps and other supporting documents.*

**Response**

We can confirm that we do hold the requested information.

**Applicable Regime**

Homes England consider the contents of the HIF bid submission to contain information that falls under both the FOIA and the EIR. Regulation 2(1) of the EIR define where information is “environmental” in nature. We have therefore reviewed the contents of the HIF bid submission and assessed whether each document falls under FOIA or EIR as defined in Regulation 2(1).

OFFICIAL



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### **FOIA Information**

We are able to inform you that we do hold information that falls within the scope of your request that falls under the FOIA, and this is attached to this response as Annex A.

We have redacted some of the information contained within Annex A under the following exemptions:

#### Section 40 – Personal information

We have redacted information on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

To disclose personal data, such as names, contact details, addresses, email addresses and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Section 40 is an absolute exemption which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exemption is engaged.

The full text in the legislation can be found on the following link;

<https://www.legislation.gov.uk/ukpga/2000/36/section/40>

#### Section 43 - Commercial interests

Under section 43(2) Homes England is not obliged to disclose information that would, or would be likely to, prejudice the commercial interests of any party.

The information requested relating to funding amounts and risk management engages section 43(2) of the FOIA as it is commercial in nature and its release would be likely to prejudice the commercial interests of Homes England and other interested parties to the information.

Homes England has identified that the information requested, if released, would be likely to prejudice the effective operation of the Housing Infrastructure Fund.

Section 43 is a qualified exemption. This means that once we have decided that the exemption is engaged, Homes England must carry out a public interest test to assess whether or not it is in the wider public interest for the information to be disclosed.

#### Arguments in favour of disclosure:

- Homes England acknowledges there is a general public interest in promoting accountability, transparency, public understanding and involvement in how Homes England undertakes its work and how it spends public money; and
- Homes England acknowledges there is an interest in the Housing Infrastructure Fund and the applications to this fund.



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Arguments in favour of withholding:

- The redacted information relates to financial awards from and to third parties. If Homes England were to release this information it would be likely to prejudice our relationship with the Council and with future partners. If Councils felt that they could not include all relevant information when submitting a bid for fear of disclosure, they may not include all relevant information in that bid. This would mean that Homes England would have to assess bids that may be less robust, and our due diligence may be impaired. This would be likely to lead to poorer outcomes and deliver less value for public money. This would not be in the public interest as it would not deliver good value to the public purse;
- Releasing the information would reveal financial information of the bidder which may in turn affect their own commercial interests. If third parties did not trust Homes England with commercially sensitive information our relationships would be put at risk. Homes England have to support our relationships with councils in order to achieve best value for public money and best possible delivery of homes to meet the objectives of our strategic plan; and
- Homes England has been unable to identify a wider public interest in disclosing the information requested.

Having considered the arguments for and against disclosure of the information, we have concluded that at this time, the balance of the public interest favours non-disclosure.

The full text of the legislation can be found on the following link;

<https://www.legislation.gov.uk/ukpga/2000/36/section/43>

**EIR Information**

We are able to inform you that we do hold information that falls within the scope of your request that falls under the definition of Environmental Information (Regulation 2(1) EIR), and this is attached to this response as Annex B.

We have redacted some of the information contained within Annex B under the following exception:

Regulation 13(1)

Under regulation 13(1) of the EIR, Homes England may refuse to disclose information that constitutes third party personal data. To disclose personal data, such as names, contact details, addresses, email addresses and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles. Regulation 13(1) is an absolute exception which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exception is engaged.

The full text of the legislation can be found on the following link:

<https://www.legislation.gov.uk/uksi/2004/3391/regulation/13/made>



Homes  
England

Making homes happen

Date: 8 July 2020

Our Ref: RFI2992

Tel: 0300 1234 500

Email: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

### **Advice and Assistance**

We have a duty to provide advice and assistance in accordance with Section 16 of the FOIA. Further to the information provided we can also advise that Kent County Council have published details relating to their HIF bid on the following link: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/housing-infrastructure-fund> .

### **Right to Appeal**

If you are not happy with the information that has been provided or the way in which your request has been handled you may request an internal review by writing to;

The Information Governance Team  
Homes England – 6<sup>th</sup> Floor  
Windsor House  
50 Victoria Street  
London  
SW1H 0TL

Or by email to [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

You may also complain to the Information Commissioner however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link

<https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

**The Information Governance Team**  
For Homes England

OFFICIAL



# Cozumel Estates Limited

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Company number: 498120  
Registered address: Patton, Moreno & Asvat (BVI) Limited, 2<sup>nd</sup> Floor, O'Neal Marketing Associates Building,  
P O Box 3174, Wickham's Cay II, Road Town, Tortola, BVI  
Correspondence address: c/o Reuben Brothers SA, 9 Place du Molard, 1204 Geneva, Switzerland

25<sup>th</sup> September 2017

**F.A.O. Mr Alok Sharma MP**

c/o Shepway District Council  
Civic Centre,  
Castle Hill Avenue  
Folkestone  
Kent  
CT20 2QY

Dear Mr Sharma MP

**Re: Otterpool/Old Folkestone Racecourse – Housing Infrastructure Fund Application**

We write on behalf of the Owners of Cozumel Estates Ltd who are currently working in collaboration with Shepway District Council (SDC) to develop a masterplan for the delivery of Kent's new garden town Otterpool Park.

The masterplan is ambitious in its scale and seeks to deliver upto 12,000 new dwellings on garden city principles based upon high quality design within an enhanced natural environment.

The masterplan seeks to frame the sustainable growth of the new settlement over the next 30 plus years.

We are aware that Kent County Council (KCC) in partnership with Shepway District Council has applied for funding from the Housing Infrastructure Fund (HIF) and we fully support this application. The delivery of Otterpool will be incredibly challenging and is beset by a high level of infrastructure requirements that have a high cost attached. Early access to this fund, and its de-risking of key infrastructure, will no doubt have a stimulating effect on the overall delivery of the settlement and allow its successful completion to be realised in full in a much truncated and seamless period of time.

We hope that you will be able to support KCC & SDC's application to receive HIF funding but please do not hesitate to contact me should you have any queries.

Yours sincerely,

s. 40(2)



S40(2)

**Cozumel Estates Ltd**

25<sup>th</sup> September 2017

Alok Sharma MP  
Minister of State for Housing and Planning  
Department for Communities and Local Government

Dear Sir

I am writing to register the Creative Foundation's continued support for the proposed bid by Shepway District Council for Otterpool Park, which could see up to 12,000 new homes being built over the next 30 to 40 years.

This major transformational project is a strategic vision to unlocking new housing. The site is conveniently located close to junction 11 of the M20, HS1, the ports and Eurotunnel. early investment in infrastructure could help stimulate much needed inward investment to the area, ensuring not only future homes for Kent and wider area but employment opportunities for the new community and beyond.

We would like to take this opportunity to register our support for Kent County Council's bid for the Housing Infrastructure Fund to unlock some of the strategic infrastructure for the Otterpool Park site.

We look forward to continuing to work with Shepway District Council and other partners in developing the proposals for Otterpool Park.

Yours faithfully,

s. 40(2)



S40(2)

Alok Sharma MP,  
Minister for Housing and Planning,  
Department for Communities and Local Government,  
2 Marsham Street,  
London,  
SW1P 4DF

27 September 2017

Dear Alok,

I am writing today on behalf of East Kent College to register our continued support for Otterpool Park, which could see up to 12,000 new homes being built over the next 30 to 40 years.

As the key further education provider in the Shepway District, East Kent College works in partnership with the South East Local Enterprise Partnership and Kent and Medway Economic Partnership to ensure the right skills development to help our communities prosper. The new Otterpool Park development will help to deliver a significant number of skilled employment opportunities for young people in the area, aiding the wider regeneration prospects within this coastal community, while unlocking much needed new housing.

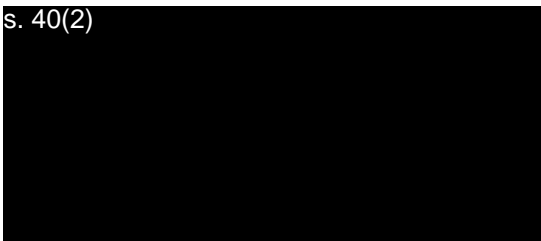
The site is conveniently located close to junction 11 of the M20, the HS1 network, the Port of Dover and Eurotunnel. Early investment in infrastructure will help stimulate much needed inward investment to the area, ensuring not only future homes for Kent and the wider area, but employment opportunities for the existing and new communities.

East Kent College would like to take this opportunity to register its support for Kent County Council's bid for the Housing Infrastructure Fund to unlock some of the strategic infrastructure for the Otterpool Park site.

The College looks forward to continuing to work with Shepway District Council and other partners on this extremely exciting development which will benefit the communities we serve for many years to come.

Yours sincerely,

s. 40(2)



S40(2)



Our ref:  
Your ref:

s. 40(2)  
S40(2)

Shepway District Council  
Civic Centre  
Castle Hill Avenue  
Folkestone  
Kent  
CT20 2QY

s. 40(2)  
S40(2)

Bridge House  
Walnut Tree Close  
Guildford GU1 4LZ

Direct Line: S40(2)  
25 September 2017

Dear s. 40(2)

### **Housing Infrastructure Fund – endorsement of the bid for 'Infrastructure programme to unlock delivery of Otterpool Park Garden Town'**

I write to advise that Highways England welcomes the opportunity to have met with officers of Kent County Council and Shepway District Council on 11th September 2017 to discuss details of the project bid for the Forward Fund as part of the Housing Infrastructure Fund concerning an *'Infrastructure programme to unlock delivery of Otterpool Park Garden Town'* in advance of the submission date.

Highways England acknowledges that the current scope of a HIF bid could influence the Strategic Road Network with improvements to upgrade M20 J11 as part of 'early highways works' to facilitate the release of strategic level housing development at Otterpool Park, the DCLG supported proposed new Garden Town settlement in Shepway District. Highways England has maintained an active and ongoing dialogue with SDC since their ambitions for growth in this area became known in 2016. Moreover we are working with consultants advising SDC, and the consultant team at Arcadis for the landowner promoters in respect of the ongoing transport modelling and assessment work that is being progressed in parallel with the site masterplan for Otterpool Park.

Specifically, Highways England has been formally consulted on the scope of the transport modelling work in order to agree the assessment parameters for the Transport Assessment that will be a key component of a future planning application for Otterpool Park. Highways England issued a written response (email) dated 25th August 2017 to provide feedback on the scope of the Transport Assessment, and on this basis an agreement on the scope has been reached. Further comments on the assessment parameters relating to trip generation, mode share and traffic distribution are to be provided separately in due course, although it is understood that the County Council has already agreed these parameters insofar as the local highway authority is concerned.

Agreement on the form(s) of highway mitigation will be subject to ongoing dialogue between the various stakeholders in order to discuss and agree the technical detail (design/ costings etc) of any scheme of highway mitigation and the transport modelling work that underpins the assessment process. The detailed co-development period post HIF submission will consider in more detail the relative timings for when highway improvement work to upgrade M20 J11 will be undertaken and this will influence when capital funding will be drawdown.

It is the professional opinion of Highways England that a suitable early package of highway mitigation can be agreed to bring forward the strategic release of development capacity at Otterpool Park Garden Town without having an unacceptable impact on the highway capacity and the safe operation of the Strategic Road Network. This package will need to take account of both the forecast significant growth in traffic (much of it cross-Channel freight related) and Highways England's proposals to accommodate and manage it (for example the proposed Lorry Park). We commit to working with all parties in pursuit of this goal.

Therefore, on behalf of Highways England, I am pleased to support the bid by Kent County Council for the Forward Fund in support of the *'Infrastructure programme to unlock delivery of Otterpool Park Garden Town'* under the Housing Infrastructure Fund and hope that you are successful with the submission.

Should you or DCLG have any queries regarding this matter, please contact me.

You will note that I have copied this letter to Route Strategy and Strategy & Planning colleagues.

Yours sincerely

s. 40(2)  
[Redacted signature]

Operations Directorate  
Email: s. 40(2) @highwaysengland.co.uk

CC Kent Corridors Route Strategy leads: s. 40(2)  
Strategy & Planning national funding programmes leads: s. 40(2)





Alok Sharma MP  
House of Commons

Tel No

S40(2)

26 September 2017

Dear Mr Sharma,

**re: Otterpool Park and bid to Housing Infrastructure Fund.**

I am writing to confirm that Historic England is working with Kent County Council and Shepway District Council about the Otterpool Park project; an exciting opportunity to create a new place that is respectful of the history of its location. We are thus very pleased to confirm support of the bid to the Housing Infrastructure Fund.

Otterpool Park contains a nationally important designated heritage asset at Westenhanger castle (grade I listed and scheduled monument) which is in need of a secure future and which can itself contribute to some of the needs of the new community, such as for green infrastructure. There are other heritage assets at Otterpool Park and we anticipate that works to create the new place will reveal more. We are in discussion about an overarching heritage strategy to ensure that throughout what will be a considerable delivery period full advantage can be taken to minimise harm to the historic environment and to maximise public benefits, such as by better understanding the history of this part of Kent.

We think that successful new places are frequently those which are grounded in a location with an older history and Otterpool Park has numerous and varied stories to tell. Works to deliver conventional infrastructure, such as roads and services, will require historic environment responses but we would also see a need for heritage infrastructure, such as the creation of places in which to present the new knowledge that will be gained and in which to safeguard the finds that will be made.

It is essential that from its inception the project should consider and respond to historic environment issues and we would see additional funding at this early but critical stage as a major benefit to ensure smooth progress along the lines that we have begun to map out.

Historic England would be pleased to answer any questions that you may have.

Yours sincerely

s. 40(2)

S40(2)

s. 40(2) [\[REDACTED\]@historicengland.org.uk](mailto: [REDACTED]@historicengland.org.uk)



**From:** s. 40(2)  
**Sent:** 21 September 2017 16:25  
**To:** s. 40(2)  
**Subject:** Oterpool Park

Dear s. 40(2)

*I am emailing you to express our support for the Council's initiative to develop the Garden Town, Otterpool Park.* s. 40(2)

*We currently employ over 600 people at our Headquarter campus and plan to expand further within the lifetime of the Otterpool proposal, in fact our new 17000 sq foot office being built now will be opening on the 5th of June 2018, and we are already discussing further buildings to cope with our fast growing business. Your ambitious plans sit well with our desire to improve the environment and facilities for our existing team and will assist in finding and attracting new people that will be living next door.*

*We wish the project well and hope that it can be brought forward as swiftly as possible.*

Yours sincerely

s. 40(2)

Holiday Extras



Indicative masterplan for Otterpool Park and indicative phasing

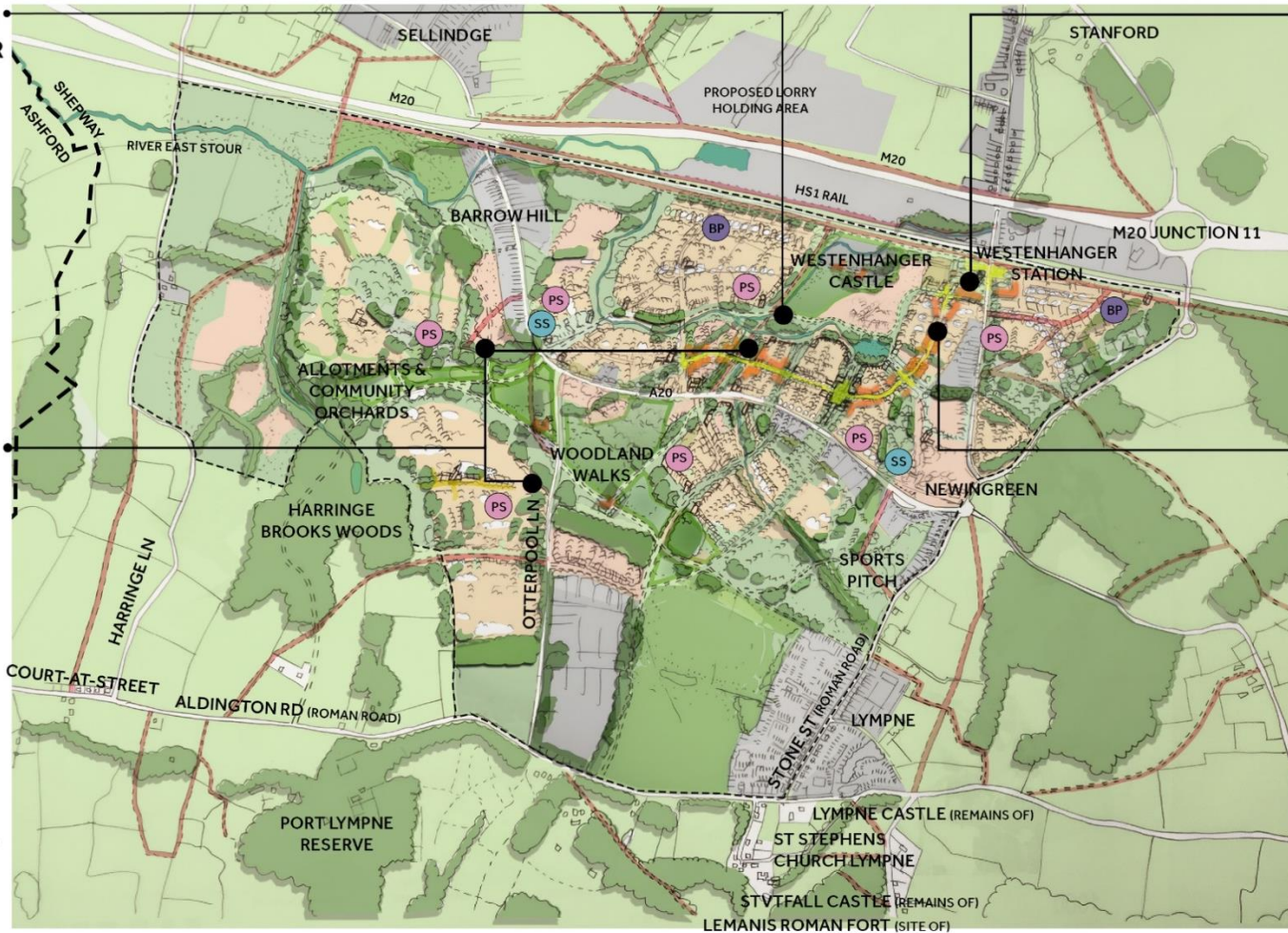
**GREEN CORRIDOR & CULTURAL QUARTER LINKING**

- SECONDARY & PRIMARY SCHOOLS
- SPORTS & LEISURE
- SPORTS CLUB
- PLAY AREAS
- MULTI-FAITH CTR
- GALLERY
- HOUSING

**LOCAL CENTRES**

- COMMUNITY HALL
- LOCAL SHOPS
- NURSERY
- PLAY
- JUNIOR SPORTS
- PRIMARY SCHOOL
- HOUSING

- SS SECONDARY SCHOOL
- PS PRIMARY SCHOOL
- BP BUSINESS PARK



**GATEWAY**

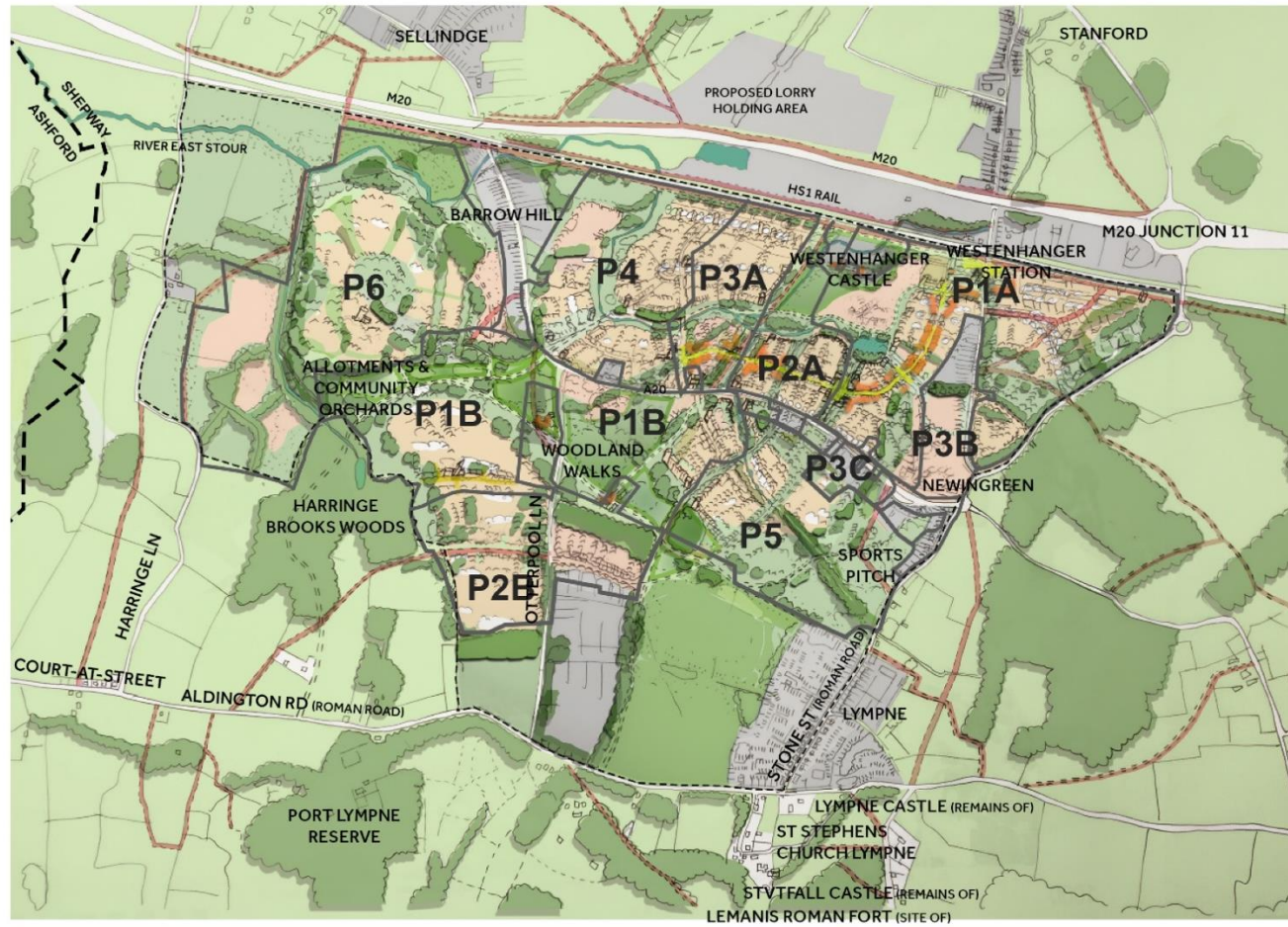
- PUBLIC TRANSPORT INTERCHANGE
- RAIL STATION
- BUS STATION
- PARK + RIDE
- HOTEL
- BUSINESS
- CAFES
- HEALTH CENTRE
- HOUSING

**HIGH STREET**

- LOCAL SHOPS
- RESTAURANT / CAFES
- COMMUNITY HALL
- DENTIST
- SMALL MEDIUM ENTERPRISE
- MARKET PLACE
- HOUSING







27 September 2017

Alok Sharma MP  
Minister of State for Housing and Planning  
House of Commons  
Westminster  
London  
SW1A 00A

Dear Mr Sharma,

## **RE: FORWARD FUNDING FOR OTTERPOOL PARK**

From the outset we have provided letters of support and continue to do so, as it is an excellent opportunity to provide a quality settlement, encompass quality housing which is much-needed, along with new business premises, whilst retaining the needs of the public realm, and I am writing to lend my support to Kent County Council and Shepway District Council in their bid for the Housing Infrastructure Fund Forward Fund to unlock delivery of Otterpool Park Garden Town.

The exciting and advanced proposal for the new garden town offers a unique opportunity to plan for long term growth of housing and jobs in the district, and the HIF funding would bring significant benefits by significantly accelerating delivery. Some of the infrastructure that is critical to creating a high quality new town are improvements to the existing railway station; a new primary school (all local schools are currently at capacity) and improvements to the road network. The Housing Infrastructure Fund could help to deliver all of these, thus ensuring rapid house building. The fact that the District Council is a major landowner provides greater control and assurance that such infrastructure will be delivered by SDC and KCC to an agreed programme.

I fully support Otterpool Park's aim to provide a range of housing including self and custom build, and opportunities for small and medium sized builders, as well as new employment space and a range of community facilities including extensive open space, health and education.

The Chamber have been a strong supporter of Shepway District Council and Kent County Council to promote the opportunities presented by Otterpool Park and thoroughly endorse this proposal for funding.

Yours sincerely

S. 40(2)

S40(2)

East Kent Economic Development Group

E-mail: [S.40\(2\)@independentinsuranceservices.co.uk](mailto:S.40(2)@independentinsuranceservices.co.uk)

Kent Invicta Chamber of Commerce: THE ULTIMATE BUSINESS NETWORK

A COMPANY LIMITED BY GUARANTEE INCORPORATED 1993 COMPANY REGISTERED IN ENGLAND  
NO. 2794615. KENT INVICTA CHAMBER OF COMMERCE, INDUSTRY & ENTERPRISE LIMITED VAT REGISTRATION  
NO. 624607057. COMPANY REGISTRATION DETAILS: COMPANY LIMITED BY GUARANTEE, REGISTERED IN  
ENGLAND NO. 2794615. REGISTERED OFFICE: ASHFORD BUSINESS POINT, WATERBROOK AVENUE,  
SEVINGTON, ASHFORD, KENT TN24 0LH



BS EN ISO 9001:2008  
Certificate No. FS 40601



The Rt. Hon. Sajid Javid, MP  
Secretary of State for Communities and Local Government  
Department for Communities and Local Government  
2 Marsham St,  
Westminster, London  
SW1P 4DF

27 September 2017

Dear Secretary of State

**Support for Kent County Council's Forward Fund Bid – Otterpool Garden Park Infrastructure Programme**

I am writing on behalf of the Kent and Medway Economic Partnership (KMEP) to express our support for the Housing Infrastructure Fund bid by Kent County Council for the Otterpool Garden Park Infrastructure programme.

This bid is one of several across Kent and Medway that has been developed to contribute to the significant growth pressures we face over coming years. In fact, as set out in the Kent and Medway Growth and Infrastructure Framework, this part of the country is expected to deliver upwards of 160,000 new homes to 2031 – a significant 20% growth in a relatively short period of time. This project would directly contribute to helping Kent and Medway to unlock and accelerate that planned housing growth, and ultimately to enabling the Government's wider growth agenda.

This project will enable a wide range of infrastructure that will unlock and accelerate delivery of housing growth at Otterpool Garden Park – a garden town which is expected to provide up to 12,000 homes and 85 hectares of employment land, including schools, shops, health facilities and abundant green space.

We look forward to working with the Government to deliver on this and the other ambitious bids that Kent and Medway are putting forward to the Housing Infrastructure Fund.

Yours sincerely

s. 40(2)



S40(2) Kent & Medway Economic Partnership

S40(2) South East Local Enterprise Partnership

S40(2) Kent & Medway Business Advisory Board

DAMIAN COLLINS MP



HOUSE OF COMMONS

LONDON SW1A 0AA

Alok Sharma MP  
Minister of State for Housing and Planning  
House of Commons  
Westminster  
London  
SW1A 0AA

27<sup>th</sup> September 2017

**Re: Forward Funding for Otterpool Park**

Dear *Moh*

I am writing to lend my support to Kent County Council and Shepway District Council in their bid for the Housing Infrastructure Fund Forward Fund to unlock delivery of Otterpool Park Garden Town. This exciting proposal for the new garden town offers a unique opportunity to plan for long term growth of housing and jobs in the district, and the HIF funding would bring significant benefits by significantly accelerating delivery. Some of the infrastructure that is critical to creating a high quality new town are improvements to the existing railway station; a new primary school (all local schools are currently at capacity) and improvements to the road network, in particular to the Junction to the A20 at Newingreen. The Housing infrastructure Fund could help to deliver all of these up front to the benefit of the new development and the whole community. The fact that the District Council is a major landowner provides greater control and assurance that such infrastructure will be delivered by SDC and KCC to an agreed programme.

I fully support Otterpool Park's aim to provide a range of housing including affordable self and custom build, and opportunities for small and medium sized builders, as well as new employment space and a range of community facilities including extensive open space, health and education.

I have been a strong supporter of Shepway District Council and Kent County Council to promote the opportunities presented by Otterpool Park and thoroughly endorse this proposal for funding.

Yours sincerely

s. 40(2)

A large black rectangular redaction box covering the signature area.





s. 40(2)  
S40(2)  
Shepway District Council  
Castle Hill Avenue  
Folkestone  
CT20 2QY

Network Rail  
Cottons Centre  
Tooley Street  
London SE1 2QG  
T 07920856200

22 September 2017

Dear S40(2)

**Otterpool Park – Housing Infrastructure Fund bid**

Network Rail can confirm that it supports in principle Kent County Council and Shepway District Council in their bid for the Housing Infrastructure Forward Fund for 'Infrastructure programme to unlock delivery of Otterpool Park Garden Town' through the upgrade to Westenhanger Station.

We have had an ongoing dialogue with you and colleagues regarding the scope of a pre-GRIP study that you will commission us to undertake to assess the options to enhance the station. We look forward to working with you on this and will continue to support the development of the project.

Yours sincerely,

s. 40(2)

S40(2)  
S40(2) South East

27 September 2017

Church House, 136 Sandgate Road  
Folkestone, Kent. CT20 2BN

Alok Sharma MP  
Minister of State for Housing and Planning  
House of Commons  
Westminster  
London  
SW1A 00A

TELEPHONE	01303 22 11 88
FAXSIMILE	01303 22 11 99
EMAIL	info@independentinsuranceservices.co.uk
MOBILE/TEXT	S40(2)
VIDEO CONFERENCING	0800 731 5276

Dear Mr Sharma,

**RE: FORWARD FUNDING FOR OTTERPOOL PARK**

I write with regards to the above and fully support this valuable project which will complement the needs and requirements for the future within the Shepway district, where I both work and live. Subsequently I am writing to lend my support to Kent County Council and Shepway District Council in their bid for the Housing Infrastructure Fund Forward Fund to unlock delivery of Otterpool Park Garden Town.

The exciting and advanced proposal for the new garden town offers a unique opportunity to plan for long term growth of housing and jobs in the district, and the HIF funding would bring significant benefits by significantly accelerating delivery. Some of the infrastructure that is critical to creating a high quality new town are improvements to the existing railway station; a new primary school (all local schools are currently at capacity) and improvements to the road network. The Housing infrastructure Fund could help to deliver all of these, thus ensuring rapid house building. The fact that the District Council is a major landowner provides greater control and assurance that such infrastructure will be delivered by SDC and KCC to an agreed programme.

I fully support Otterpool Park's aim to provide a range of housing including self and custom build, and opportunities for small and medium sized builders, as well as new employment space and a range of community facilities including extensive open space, health and education.

The Chamber have been a strong supporter of Shepway District Council and Kent County Council to promote the opportunities presented by Otterpool Park and thoroughly endorse this proposal for funding.

Yours sincerely

s. 40(2)

S40(2)

E-mail: [s.40\(2\)@independentinsuranceservices.co.uk](mailto:s.40(2)@independentinsuranceservices.co.uk)

The world's first carbon-neutral insurance broker





# *Shepway Business Advisory Board*

*Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY*

Rt Hon Alok Sharma  
Minister of State for Housing and Planning  
Department for Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

25<sup>th</sup> September 2017

Dear Minister

## **Kent County Council bid to the HCA Forward Fund for Otterpool Park Garden Town**

The Shepway Business Advisory Board is a forum of businesses in the Shepway local authority district which meets regularly to discuss local and national issues that affect business. As Chairman of the Board I am writing to convey our support for Kent County Council's application to the HCA Forward Fund for the Otterpool Park Garden Town which is being led by Shepway District Council.

This major project will be transformational for Shepway district, as well as for the wider Kent and Medway area, and has the potential to bring forward up to 12,000 new homes and to attract new employment opportunities to the district.

The Board is very supportive of bringing Otterpool Park forward and our business board members recognise the clear opportunities that this offers to existing businesses in Shepway district, as well as to the wider Kent and Medway economy.

This forward funding will provide early investment in the infrastructure necessary for the success of this new settlement which will attract new inward investment to the area and ensure that there are future employment opportunities for the new community and beyond.

We would therefore like to take this opportunity to register our support for Kent County Council's bid for the Housing Infrastructure Fund to unlock some of the strategic infrastructure for the Otterpool Park site.

Yours faithfully

s. 40(2)



S40(2) Shepway Business Advisory Board

27<sup>th</sup> September, 2017

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Alok Sharma MP  
Minister of State for Housing and Planning  
House of Commons  
Westminster  
London  
SW1A 0AA

Dear

Thank you for the opportunity to bid to be part of the Housing Infrastructure Fund – the fund is further proof of this government's support for homes and jobs. The fund is particularly welcome as I was re-elected, as Leader of Shepway District Council on a promise of delivering more homes and jobs. My colleagues and I are working extremely hard to deliver on that promise.

Otterpool Park - our garden town has already received important support from yourself and your department. It has the benefit of being planned as a self-contained new community so all infrastructure including roads, schools and improvements to the local railway station will be directly related to the new homes being built.

If the Kent County Council bid to the Housing Infrastructure Fund is successful it will help provide the necessary infrastructure to further unlock our plans for Otterpool Park.

As landowner the council, continuing to work closely with Kent County Council, can bring greater control to delivery of the project to ensure the commitments to accelerated housing delivery are met. The infrastructure set out in the HIF proposal will be essential to achieving this rapid pace of growth.

As with all schemes of this sort the existing population are worried about the impact on local infrastructure but with Government support for the necessary improvements we will be able to push on and win even greater support for our plans to bring more homes and jobs to Shepway.

Yours

s. 40(2)



Leader of the Council



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## Housing Infrastructure Fund - enquiry

Bid details	Primary Local Authority	Kent County
	Project type	Forward funding

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### Contact details

s. 40(2)

s. 40(2)

s. 40(2)

Lead details

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### Scheme details

Scheme name

Scheme description

Otterpool Park Garden Town, Shepway, Kent

Otterpool Park is a new garden town between Folkestone and Ashford in Kent. It will deliver long term housing and jobs growth over several planning periods to meet Shepway District Council's (SDC) identified need for over 14,500 homes to 2037. Up to 12,000 additional, quality and technologically smart homes will be delivered at Otterpool, with significant growth continuing beyond the plan period. The new town will include upgraded road, rail and bus infrastructure including high speed rail services to London, ultrafast broadband, employment, schools, shops, health and recreational facilities. SDC is a major landowner alongside the Homes and Communities Agency and Cozumel Estates. Otterpool Park's masterplan and planning application demonstrates an exceptional opportunity to enable accelerated major growth in quality homes and jobs in a positively planned manner in a truly green setting, helping to address the demonstrable housing crisis in Kent and the wider South East.

Physical infrastructure

Road/highway, Bridge, Education, Rail, Power supply, Health facilities, Electricity / Gas connections, Flood defence, Public realm works, Land assembly, Land remediation, Water works, Digital infrastructure, Other

Physical infrastructure (other)

Site plan(s)

Strategic landscaping and a business innovation centre  
Otterpool Park Garden Town Indicative Masterplan (file: Indicative masterplan for Otterpool Park and indicative phasing .pdf)

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### Delivery milestones

Planning status

None

Planning permission target date

01/12/2019

Statutory planning permission target date

01/12/2019

Infrastructure - dev partner identified

30/09/2018

Infrastructure - dev partner appointed

01/12/2018

Housing - dev partner identified

30/09/2018

Housing - dev partner appointed

31/01/2019

Start of infrastructure works

02/01/2019

Completion of infrastructure works

31/01/2022

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### Financials

Funding amount

£281,230,000

2017/2018

£250,000

2018/2019

£51,040,000

2019/2020

£119,215,000

2020/2021

£110,725,000

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Total infrastructure costs (inc. sunk costs)	s. 43
Land	s. 43
Costs incurred to date (excluding land)	s. 43
Costs to complete	s. 43
Previous Funding Application	Yes
Previous Funding Application Details	In November 2016 Shepway District Council (SDC) received Garden Town status for the development of proposals for Otterpool Park from DCLG. As part of a package of support DCLG provided capacity funding of £750,000 to the council and in March 2017 SDC received a further £345,000 from DCLG. Total funding received £1,100,000.
Local Authority investment (inc. LGF funding)	Total: £10,525,000 Secured: £7,875,000
PWLB loan	s. 43
Other public sector investment	s. 43
CiL/S.106 contribution	
Private sector investment (inc debt finance)	s. 43
Indicative public sector investment	74 %
Aim to recover funding	Yes
How intend to recycle	A tariff mechanism, details of which will be agreed by SDC, KCC and DCLG, will be used to recover the upfront physical infrastructure costs from housebuilders. An assessment of total potential S106 contributions is c.£297.5m (2017), indicating that after total infrastructure delivery, £174.4m may be available for recycling for future homes. This will be subject to viability assessments at the point of delivery and therefore it is anticipated will increase throughout the life of the development.

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Development profile	Number of sites	1				
	Total size of site	617 ha				
	Area on brownfield	5 ha				
	<table border="1"> <thead> <tr> <th>Local Authority</th> <th>Number of Homes</th> </tr> </thead> <tbody> <tr> <td>Shepway</td> <td>12000</td> </tr> </tbody> </table>	Local Authority	Number of Homes	Shepway	12000	
Local Authority	Number of Homes					
Shepway	12000					
	Total number of homes	12,000				
	Full / Detailed	0				
	Outline	0				
	Planning in principle	0				
	Allocated	0				
	None	12,000				
	Profile up to 2020	25				
	Profile 2021 - 2025	1,225				
	Profile 2026 - 2030	2,250				
	Profile 2031 - 2035	2,250				
	Profile future years	6,250				
	Homes delivered if without funding	12,000				
	Explanation for number delivered	With HIF the rate of house building is 3 times that of a scenario without HIF funding. Up to 2022, 425 high quality homes can be delivered with HIF but without HIF only 140 homes can be				

built. Only 4300 homes can be delivered up to 2041/42 without HIF compared to up to 8500 with HIF. The remainder of the 12000 will be built post 2042. HIF enables the early provision of physical infrastructure and negates lengthy S106 negotiations allowing higher quality development to be accelerated at pace.

Providing site valuations

Yes  
Financial and Land Value Assumptions (file: Financial and Land Value Assumptions v3 FINAL DRAFT.docx)

Options appraisal

Problem being addressed

Meeting the long term need for housing and employment growth in the district in a planned way, and attracting more people of working age to rebalance the age demographic in the district, which has an above average percentage of older people. Shepway District Council has been successful in delivering a relatively high rate of brownfield sites in recent years with expansions to existing settlements, but such opportunities are now very limited and existing facilities at capacity. A new community allows infrastructure to be planned without putting pressure on already strained services. However while this is an excellent location for development it will require significant investment up front in a new and untested market for developers. This will have significant cashflow problems for any development partner. HIF funding would help to overcome this and provide confidence to the market.

Options considered

1. Do nothing: housing need is unmet; sites delivered in a reactive way through speculative planning applications. No opportunity for employment growth (Shepway has very limited employment land available to meet modern standards).  
2. Alternative development strategy for district: incremental growth across all towns and villages. This would put increased pressure on existing facilities without generating enough contributions, or providing enough land to build new ones.  
3. Allocation of land in this location for market delivery. This would result in incremental development by housebuilders, each delivering its own infrastructure. Would not create coherent place; employment of any scale would be hard to deliver.  
4. Garden town: allows proper planning, timely provision of infrastructure, and capturing uplift in values. Existing local communities can benefit from the development, which cannot be achieved through other options.

If funding not secured

KCC and SDC do not have the borrowing capacity to forward fund infrastructure to the scale required. The alternative is selling the site in parcels to housebuilders; each would meet its own infrastructure need, which would lag behind housing as cash flow would not allow for up-front investment. Such a model would be slower to start due to longer timescales to negotiate S106 agreements, resulting in a much reduced rate of housing delivery, and housing numbers would be limited to development that can take place without significant investment in infrastructure. With HIF the rate of house building is 3 times that of a scenario without HIF funding. Up to 2022, 425 high quality homes can be delivered with HIF but without HIF only 140 homes can be built. Only 4300 homes can be delivered up to 2041/42 without HIF compared to up to 8500 with HIF. The remainder of the 12000 homes will be delivered post 2042 with HIF funding.

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Strategic approach

Demonstrate strong local leadership

SDC has demonstrated its ambition for housing growth by making land available at Otterpool Park for housing over a 30+ year time horizon, covering multiple Local Plan periods and beyond existing housing need. It has shown leadership in buying land to help deliver housing and controlling its quality, to create a legacy. KCC and SDC have worked closely together from the start, both politically and operationally, with strong political support and leadership from both KCC and SDC. The councils are working closely together on the planning and service delivery for the site, and have jointly signed a Planning Performance Agreement with the promoter to demonstrate this commitment. Otterpool Park brings forward homes at a greater pace than would otherwise be achieved. As SDC already has a NPPF-compliant Core Strategy Local Plan (CSLP) adopted in 2013 it did not need to review its Plan at this stage, but its early review demonstrates the ambition for long term planning and promoting housing growth. Annual housing trajectory will therefore increase from 350-400 homes in the existing CSLP to 633 (based on latest SHMA figures). The LPA will not be relying on Otterpool Park alone for housing delivery; it has identified other sites in the locality in Sellindge and Lympe in addition to its draft Places and Policies Local Plan (submission draft currently being prepared) allocates small and medium sized sites for development in the short to medium term. KCC has an ambitious aspiration to work effectively with its district authority partners to secure more land to enable the plan led delivery of additional housing throughout the county and will seek to use any recycled funds from the HIF for these purposes and repeat the success of the garden town model.

Demonstrate unlocking new & better homes

To attract new residents and business to a new location Otterpool Park must offer a high quality of life, good quality housing and an attractive and well-designed new town. A crucial aspect of this will be ensuring infrastructure and community facilities are in place early on. The existing housing market within Shepway District is not strong by Kent standards, with new build homes valued at £250-£300 per sqft. With the right investment upfront early on Otterpool Park can raise values and create its own housing market, attracting new developers to the area. It can meet the gap in supply for 3 and 4 bed family homes in the area. <br/>Otterpool Park can also demonstrate land value capture through reinvestment by SDC in the new community and its proposals for long term stewardship. Investment through HIF releases funds to meet objectives for raising design quality across all housing and public buildings.

Demonstrate diversifying housebuilding market

The Guiding Principles for Otterpool Park include a commitment to delivery of self and custom build homes. SDC has begun developing its strategy for facilitating self custom build and is currently looking at use of the Community Housing Fund to support this. KCC supports the principles of the Social Value Act through its procurement processes. This project would sign up to these principles as a minimum in demonstrating support for local initiatives and the local supply chain. SDC's control of the land will help to ensure the delivery of this. SDC also maintains a list of local businesses that have expressed an interest in being involved in Otterpool Park. SDC is looking at off site manufacture where this can demonstrate speed of delivery and a high quality product. Housebuilding in this area in recent years has been limited to a few major housebuilders and some

	smaller local ones due to perceived marginal values in east Kent. This scheme will help stimulate an interest in the area.
Local MP(s)	Yes MP Damian Collins Letter of Support for Otterpool (file: MP Forward Funding for Otterpool Park.pdf)
Local community	Yes East Kent College letter of support for Otterpool (file: EKC Letter of support 270917.pdf) Holiday Extras (employer on site) letter of support for Otterpool (file: Holiday Extras pdf) Kent Invicta Chamber of Commerce letter of support for Otterpool (file: KICC letter.pdf) Locate in Kent letter of support for Otterpool (file: LIK Letter of Support - Otterpool Park 27 09 2017.pdf) Historic England letter of support for Otterpool (file: Historic England Housing Infrastructure Fund letter Alok Sharma MP.pdf) Creative Foundation letter of support for Otterpool (file: Creative Foundation.pdf) Independent Insurance Services letter of support for Otterpool (file: RJ Insurance letter.pdf) Shepway Business Advisory Board letter of support for Otterpool (file: SBAB response reHCA Forward Fund FINAL 250917.pdf) Natural England Pre-App Advice (file: NE Otterpool Park - initial meeting 07 December 2016.pdf) Natural England and Environment Agency Joint Offer (file: NE-EA joint offer - Otterpool Park - final.pdf) Highways England letter of support for Otterpool (file: Highways England 20170925-DCLG-HIF-Otterpool-bid-HE-suppt_044227B8.pdf) Network Rail letter of support for Otterpool (file: Network Rail Letter to SDC re Otterpool Park Garden Town.pdf) Cozumel Estates letter of support for Otterpool (file: Cozumel.pdf)
Local Enterprise Partnership(s)	Yes SELEP Letter of Support for Otterpool (file: SELEP HIF Endorsement Kent CC Otterpool.pdf) Kent and Medway Economic Partnership letter of support for Otterpool (file: KMEP letter - HIF Endorsement - Draft - Otterpool Garden Park Programme - 27.09.17.pdf)
All supporting Local Authorities	Yes Shepway District Council letter of support for Otterpool (file: SDC Letter of Support .pdf)
Dev partner(s) (Infrastructure)	No Kent County Council is working in partnership with Shepway District Council, HCA and a private sector partner Cozumel Estates. These organisations are direct delivery partners and the procurement of the infrastructure provider will commence in 2018.
Dev partner(s) (Housing)	No Kent County Council is working in partnership with Shepway District Council, HCA and a private sector partner Cozumel Estates. These organisations are direct delivery partners and the procurement of the housing development partners provider

will commence in 2018.

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Plan status	Plan adopted or submitted How funding will help	No SDC has acted quickly to commence work on a review of the adopted Core Strategy (2013) to provide a policy allocation for a new settlement. Its published SHMA (2016) identifies additional housing need for the period 2014-2037 beyond that planned for in the adopted Core Strategy. The Local Plan will be published for consultation (Reg. 18 and 19) in 2018, with Submission in March 2019 and a target adoption date by the end of 2019, which will align with the submission and determination of the planning application. The infrastructure works will commence prior to the end of 2019, demonstrating commitment from key partners and confidence to the community and other stakeholders.
Approach to delivery	Outline delivery plan  Plans to deliver infrastructure	Otterpool Park Outline Delivery Plan (file: Otterpool Park HIF Outline Delivery Plan Final v2.docx) SDC, Cozumel and HCA will sign a collaboration agreement as a precursor to entering into a joint venture (JV) with a developer partner for Otterpool Park. This JV will work with KCC as accountable body to coordinate all infrastructure delivery. The Local Authority delivery team who will lead on the delivery of the infrastructure will be KCC and their partner Local Authority, Shepway District Council. Kent County Council has extensive previous experience of enabling residential and commercial development across the county and delivering large physical infrastructure projects of a similar scale to that required at Otterpool Park. The ambitious programme for infrastructure is achievable because delivery is spread across a range of different types of infrastructure that can be procured concurrently under separate work streams.
	Link between infrastructure and homes	On a Garden Town proposal of this scale, major investment is required in the early stages to unlock and accelerate the delivery of the homes. Currently, Otterpool Park is a largely undeveloped greenfield site with no current provision for utilities, inadequate transport infrastructure and a lack of capacity in local schools and healthcare provision. In order to deliver the homes, multiple packages of work will need to be undertaken up front and in a comprehensively planned manner. The delivery of up to 12,000 new homes relies upon the provision of new water, electricity and gas supply, wastewater treatment, broadband, new access roads, upgrades to the strategic road network, upgraded railway station, new primary schools and secondary provision, healthcare centre, commercial and employment space and parks and recreational facilities. We have demonstrated that the early provision of the physical infrastructure will triple the rate of the delivery of new homes.
	Delivery partners working together	SDC and Cozumel as joint landowners have a signed collaboration agreement and the intention is for the HCA to be a third party to this agreement following the completion of their land acquisition. The project is currently run through a Collaboration Board. KCC and SDC have jointly signed a Planning Performance Agreement with the promoter and there is an established working group that meets monthly. KCC will

also lead on the establishment of governance arrangements for the infrastructure scheme, building on successful relationships with key partners including Highways England and Network Rail. Evidence of the effectiveness of the partnerships is shown by the level of progress made to date. This has been extensive and rapid with most of the land acquired, stage 1 feasibility and masterplanning nearing completion, public engagement well advanced, Local Plan preparation accelerated and the development of the outline planning application well underway and due for submission in March 2018.

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**Supporting documents**

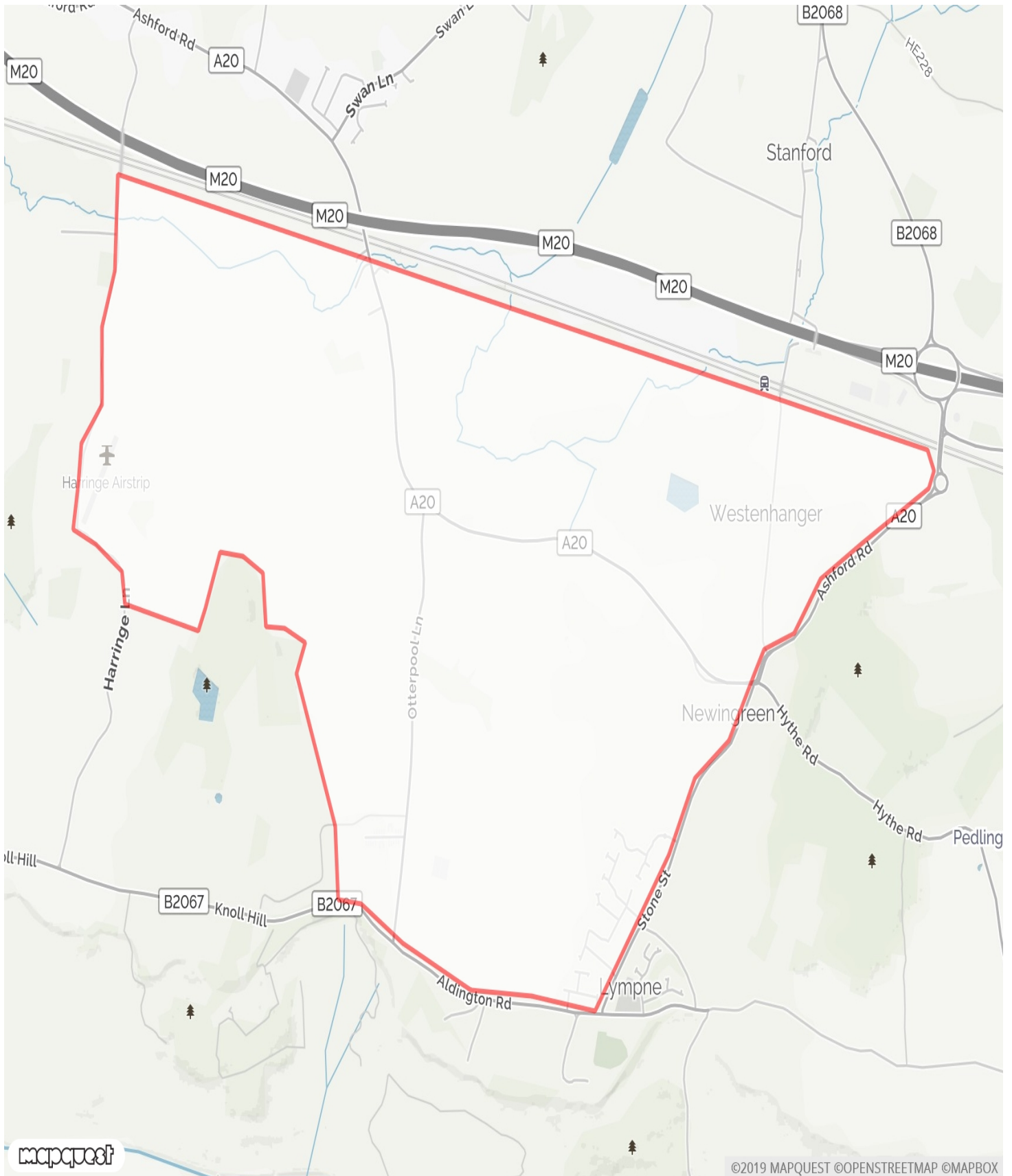
File	Description
Final HIF Risk Register Otterpool.docx	Otterpool Park Risk Register
Otterpool Park Infrastructure and Housing Delivery Programme v1.xlsx	Otterpool Park Delivery Programme
Otterpool Park Infrastructure costs 170922 FINAL DRAFT v2.xlsx	Otterpool Park Infrastructure Costs

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History

Submitted date

28/09/2017





# Housing Infrastructure Fund

## Outline Delivery Plan – Forward Funding

This template document is for your Outline Delivery Plan, which is to be submitted with your online submission form to provide further information on the delivery of your proposal.

Your Outline Delivery Plan should be no more than 10 pages of A4.

If you require any assistance or have any queries, please email us at [HIF@hca.gsi.gov.uk](mailto:HIF@hca.gsi.gov.uk)

Kent County Council

Local Authority: \_\_\_\_\_

Otterpool Park Garden Town, Kent

Scheme Name: \_\_\_\_\_

# 1. Scheme – plan and progress to date

Please provide a short summary of the overall development strategy for the scheme and progress to date to support the information on the online form.

If you have had any engagement with any government departments (excluding DCLG and the HCA) related to your proposal you should include details here

## 1.1 Introduction

Kent County Council, KCC, is working in partnership with Shepway District Council, SDC, the HCA and a key private sector partner, Cozumel Estates, to unlock a major new source of housing supply in Kent - Otterpool Park. All partners are jointly committed to a shared agenda of sustainable housing growth and facilitating the provision of the associated essential enabling physical infrastructure.

DCLG awarded Otterpool Park Garden Town status in 2016; this offers an exceptional opportunity for Kent to provide up to 12,000 homes over a 30 year period on a site of 578 hectares. Our ambition and vision is to deliver a 21<sup>st</sup> Century garden town at pace, that is both exemplar in quality and significantly contributes to the housing needs of our residents.

The majority of the land required for Otterpool Park is in the control of Shepway District Council and Cozumel Estates. The HCA are due to conclude a land acquisition within the scheme curtilage in autumn 2017 and is intending to become a direct delivery partner within the scheme.

## 1.2 Progress to date

Progress to date on Otterpool Park has been rapid. Full information can be found on the SDC website <https://www.shepway.gov.uk/otterpool-park>

Specific areas of progress are summarised in Table 1.

Table 1: Summary of Progress to Date on Otterpool Park

Stage / Gateway	Timeline	Comments
<b>Land Ownership</b>	<b>Close to completion</b>	72% of the area of search is in the ownership or control of SDC and its JV partner Cozumel Estates. The remaining properties are in multiple ownership and not required for the masterplan. SDC has committed to using its CPO powers should any specific areas of land be necessary to deliver the masterplan. Savills are retained for land advice.
<b>Collaboration Agreement: SDC &amp; Cozumel</b>  Refer to supporting documents	<b>Complete August 2016</b>	A Collaboration Agreement between Cozumel and SDC has established the principles of land acquisition; equalisation of land value and costs; and the funding of a comprehensive masterplan and planning application. Pinsent Masons are retained for legal advice.



Stage / Gateway	Timeline	Comments
<b>Stage 1 Feasibility and Capacity Study</b>	<b>Complete 2016</b>	The stage 1 feasibility work has concluded that there are no significant barriers to delivery.
<b>Masterplan</b>	<b>Ongoing 2016-2018</b>	The masterplan process has been undertaken by a team led by internationally renowned Farrell and Partners with support from Arcadis and Montagu Evans.
<b>Appraisal of costs and test of viability and deliverability</b>	<b>Complete June 2017</b>	Montagu Evans as part of masterplanning process has produced a series of viability sensitivity tests at different levels of quantum and affordable housing levels. The results show the masterplan is viable overall but upfront investment in infrastructure may slow initial delivery without assistance.
<b>Community engagement</b>	<b>Sept 2016 - ongoing</b>	An extensive programme of engagement is currently underway so that the aspirations of Kent residents and other stakeholders can be met and their concerns addressed as far as possible.
<b>Outline planning application</b>	<b>Planned March 2018</b>	The partners intend to submit an outline planning application in March 2018 following successful completion of the masterplanning work and engagement.

Table 1 Cont.: Summary of Progress to Date on Otterpool Park

### 1.3 Overall Development Strategy

The objective of the development strategy is to identify and appoint a private sector delivery partner who will provide the expertise and experience to deliver serviced development land for the residential and commercial development over the life of the project. The expectation is that the partner will be responsible for the delivery of the masterplan as a whole.

The development strategy for securing the private sector delivery partner is outlined in Table 2.

Table 2: Otterpool Park Development Strategy

Stage / Gateway	Timeline	Process and outputs
<b>Identify financial structure</b>	<b>Sept to Dec 2017</b>	Design of a financing structure that releases funding streams from the public and private sector for both development and infrastructure.
<b>Finalise business plan for the main landowners</b>	<b>Dec 2017</b>	The business plan will articulate a delivery model that meets SDC and Cozumel's commercial and economic objectives, balancing viability with high quality scheme.
<b>Finalise Procurement Strategy</b>	<b>March 2018</b>	The procurement strategy will: <ul style="list-style-type: none"> <li>Articulate an appropriate phasing structure that ensures that the required infrastructure and housing can be secured in deliverable tranches.</li> </ul>



Stage / Gateway	Timeline	Process and outputs
		<ul style="list-style-type: none"> <li>Define the preferred delivery model, the type of partner in the context of public sector procurement regulations.</li> <li>Identify risks and appropriate mitigations, including a proportionate approach to the management of SDC's and Cozumel's exposure to financial risk.</li> </ul>
<b>Procurement and Appointment of Main Infrastructure Delivery Partner</b>	<b>Dec 2018</b>	<p>The delivery process will use tried and tested frameworks and approaches to ensure a partner is identified in the timescales. This will require a two stage process of sifting initial interest (stage 1) and a bidding process for shortlisted partners (stage 2).</p> <p>Stage 1 will require the landowners to:</p> <ul style="list-style-type: none"> <li>Seek expressions of interest - that will include extensive marketing and targeted search for prospective development partner.</li> <li>Producing evaluation criteria to be used in shortlisting expressions received and manage the process of assessing expressions of interest received including producing evaluation reports.</li> </ul> <p>Stage 2 will require:</p> <ul style="list-style-type: none"> <li>The production of a full pack of information, documents, and materials</li> <li>Formal tenders to be issued to shortlisted parties and a robust assessment carried out.</li> </ul>
<b>Appoint Housing Development Partner</b>	<b>2019</b>	The preparation of a development and land drawdown agreement (or series of agreements) following appointment of a preferred developer.
<b>Start on site for Infrastructure</b>	<b>2019</b>	The infrastructure strategy is fully aligned to enable delivery of outputs in line with the programme outlined in the HIF funding prospectus.
<b>Start on site for Housing</b>	<b>2020</b>	The development strategy is fully aligned to enable delivery of outputs in line with the programme outlined in the HIF funding prospectus.

Table 2 Contd.: Otterpool Park Development Strategy

#### 1.4 Engagement with Central, Local Government and other Stakeholders

Engagement has taken place with the following central government departments:

- Department for Transport
- Department for International Trade

- Department of Communities and Local Government

The HCA is also a key stakeholder of the project and is seeking to join the landowner joint venture by acquiring and then investing in land within Otterpool Park. Discussions are ongoing with the HCA the other landowner partners to discuss a future strategic partnership.

Extensive engagement has been undertaken with key stakeholders since 2016, such as Natural England, Kent Downs AONB, Environment Agency, Highways England, Network Rail, Bus Operator, Locate in Kent, Kent & Medway Economic Partnership, KMEP, South East Local Enterprise Partnership, SELEP and local businesses. Representatives also attended the statutory agency workshop held in April 2017 to discuss the emerging masterplan.

A full programme of local engagement is well established and has undergone several rounds of public engagement including with residents, parish and town councils and businesses. Further events are scheduled prior to the submission of the planning application in March 2018.

In addition, letters of support for this HIF EOI have being received from the following stakeholders and are attached to the EOI application form.

Shepway District Council  
Damian Collins, MP  
Historic England  
Highways England  
Network Rail  
Locate in Kent  
KMEP  
SELEP  
Holiday Extras (a national business located within the site) and local businesses  
Shepway Business Advisory Board  
East Kent College  
Kent Invicta Chamber of Commerce  
Creative Foundation

The original Expression of Interest to the DCLG's Locally-Led Garden Villages, Towns & Cities Prospectus issued by the DCLG in March 2016 also contained written support from a wide range of stakeholders, including the local Member of Parliament, Damian Collins who remains a keen advocate of the project and a strong supporter of our proposals. This document can be found at:

[https://www.shepway.gov.uk/media/3726/Otterpool-Park-Expression-of-Interest/pdf/Shepway\\_District\\_Council\\_Eoi.pdf](https://www.shepway.gov.uk/media/3726/Otterpool-Park-Expression-of-Interest/pdf/Shepway_District_Council_Eoi.pdf)



## 2. Delivery team

2.1 Please provide details of the Local Authority team who will lead on the delivery of the scheme, including its capacity, capability and experience in delivering similar projects.

Kent County Council has extensive previous experience of enabling residential and commercial development across the county. Previous examples include the Kings Hill development in Tonbridge and Malling, which is a high quality sustainable live, work and play development of a similar nature to Otterpool Park. SDC is also an experienced authority in bringing forward sites for development including brownfield sites and delivering new homes for a range of tenures and new commercial space.

KCC and their partner local authority, SDC, will lead on the delivery of the Otterpool Park infrastructure scheme. The KCC Major Capital Programme Team is led by a Chartered Civil Engineer who is highly experienced in programme and project management. All members of the KCC team are also trained to Association of Project Manager Practitioner standards and are currently successfully managing and delivering the £320m Local Growth Fund Programme for Kent, which consists largely of physical infrastructure projects of a similar scale as the Otterpool Park infrastructure requirements. KCC is also high experienced in the delivery of the Kent schools and community facilities programme. The delivery team has the capacity to grow organically in line with the proposed phasing of the development. The current team organogram is shown in Figure 1.

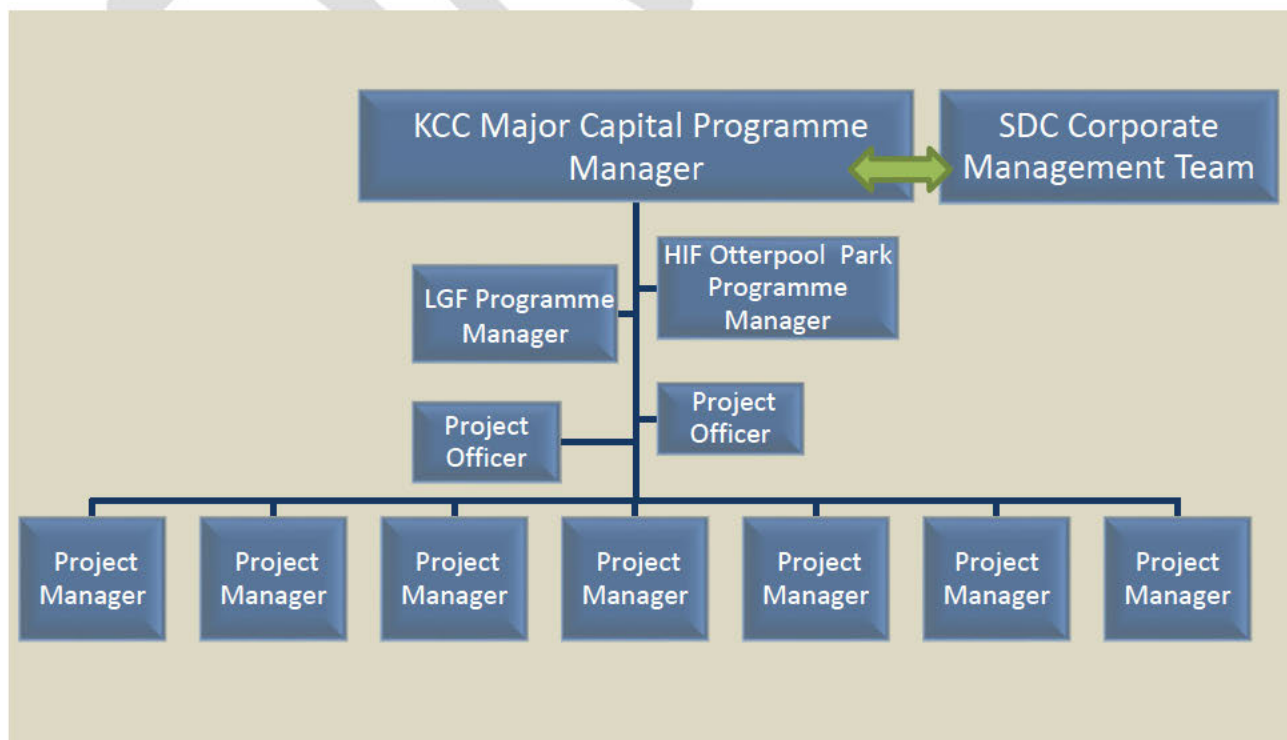


Figure 1: Otterpool Park Infrastructure Delivery Team

2.2 Please provide details of the private sector partners for the scheme, including their capacity, capability and experience in delivering similar projects.

Cozumel Estates is a private sector partner at Otterpool Park. The company is wholly owned by the Rueben Brothers who have significant experience in the delivery of similar development schemes such as their current joint venture on Merchant Square, a mixed-use development of circa 2 million sq. ft. in the heart of Westminster.

2.3 Please identify any other resources which are still required to support delivery of the scheme, including the process which is in place for securing these.

SDC has a full professional team in place for planning and delivery of Otterpool Park:

- Arcadis as lead consultant and project manager,
- Farrells – masterplanning
- Montagu Evans – financial modelling and valuation advice
- Kevin Murray Associates – community engagement
- Property House – communications

Further specialist services will be commissioned via mini competition through existing OJEU procured frameworks in 2018 for areas such as highway, transportation, structures and rail.

### 3. Project management and monitoring arrangements

3.1 Please provide details of the existing or proposed project management arrangements for the scheme.

#### 3.1.1 Otterpool Park Project management

The project is managed by the Collaboration Board (CB), the Terms of Reference for which are set out in the Collaboration Agreement between SDC and Cozumel. The CB has three representatives each from SDC and Cozumel and takes all key decisions relating to the project, including land acquisition, planning strategy and delivery strategy. HCA, as a landowner will also be invited to join the Board. The structure is shown in Figure 2.

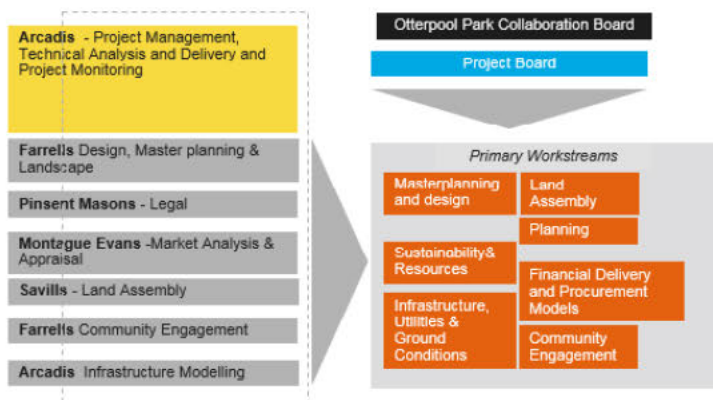


Figure 2: Otterpool Park Project Management Structure

s. 43



s. 43



3.2 Please provide details of the existing or proposed monitoring arrangements for the scheme.

KCC, together with its partners, will set up a clear and robust structure to provide accountability and an effective decision-making process for the management and monitoring of the scheme. The governing body will include senior officers and members. A proposed governance structure is shown in Figure 3.

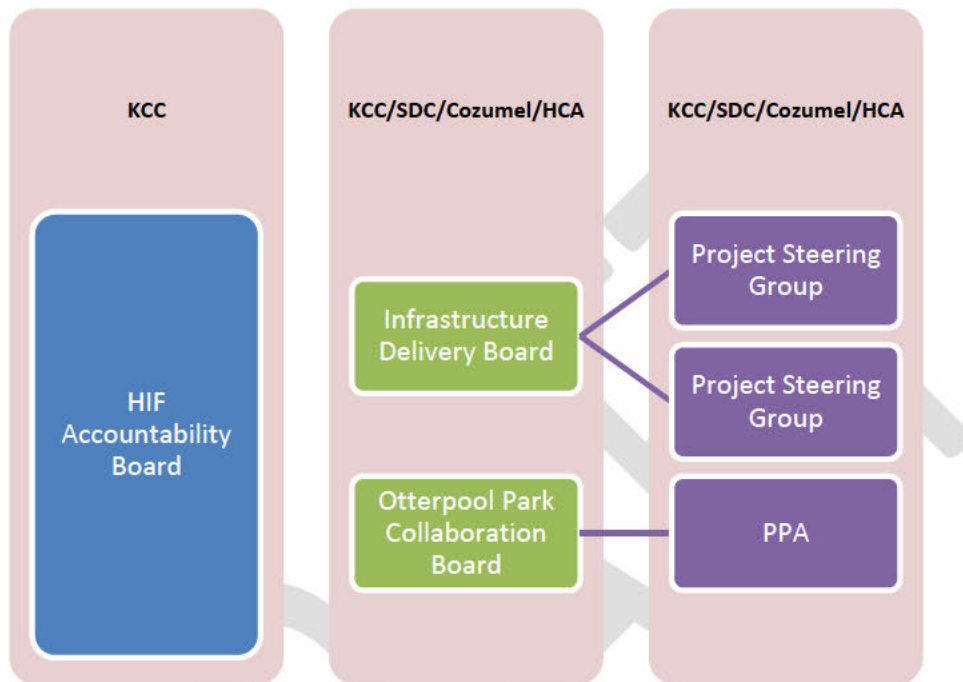


Figure 3: Proposed Monitoring Arrangements for Scheme

## 4. Local housing market and housing delivery

4.1 Please provide details of the local housing market in the location of the scheme and how the proposed scheme fits with local demand.

Montagu Evans has undertaken an initial housing market assessment for the promoters. This work concluded that the vast majority of the assessed future demand for dwellings is for 3 and 4+ bedroom homes, but there is also demand for smaller units. It concluded that while the focus would be on 3 and 4 bed units, a town the scale of Otterpool would be expected to offer a wide range of unit sizes and appeal to as wide a range of buyers as possible. This aligns very closely with the outputs of the Strategic Housing Market Assessment, SHMA, by Peter Brett Associates, commissioned jointly by Shepway and Dover District Council LPAs (2016).

The SHMA set out the housing needs for Shepway District as 14,500 units between 2014-2037. s. 43

The SHMA also established a need for approx 60 units per year of market (2/3) and affordable (1/3) specialist sheltered and extra care housing. Montagu Evans noted that there is strong interest in the retirement home sector from developers at present, but suggests this should be timed to align with provision of infrastructure and facilities that will make Otterpool Park an attractive location for the older community. This later timing for retirement housing aligns with one of the objectives for Otterpool Park which is to attract people of working age to the district, which can then be followed with meeting the needs of the aging population.

4.2 [Please provide details of whether a land trader, direct development or alternative model will be used to deliver the housing.](#)

The development strategy will consider all alternatives and recommend a preferred option following the detailed financial assessment. It is likely that because of the scale and timeline of the project, that a long term master developer will be the main partner who will in turn release land to house builders for delivery of tranches. This has the advantage of maintaining overall control and capturing land value uplift whilst at the same time allowing for flexibility through different delivery options. For example as well as volume housebuilders, land could be made available for self-build, housing associations and some direct development by SDC itself.

## 5. Other supporting information

[Please provide any other information that supports the expression of interest and should be considered as part of the assessment of how the scheme and homes can be delivered.](#)

Supporting documents have been attached to the on-line application form:

- Scheme Risk Register
- Cost Schedule for HIF Physical Infrastructure
- Programme for Infrastructure and Housing Delivery

Date: 15 December 2016  
Our ref: DAS/11529/202390



Reg 13(1) , Reg 13(1) , Arcadis  
Reg. 13(1) , Reg 13(1) , Arcadis

cc Reg. 13(1) , Reg 13(1) , Shepway DC  
Reg. 13(1) , Reg 13(1) , Arcadis  
Reg. 13(1) , Reg 13(1) , Shepway DC  
Reg. 13(1) , Reg 13(1) , Shepway DC

Customer Services  
Hombeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

0300 060 3900

**BY EMAIL ONLY**

Dear Reg. 13(1) and Reg. 13(1) ,

**Discretionary Advice Service (Charged Advice)**

**DAS 2158**

**Development proposal and location:** Otterpool Park garden town

Thank you for meeting with us on the above on 07 December 2016, at our Ashford office.

This advice is being provided as part of Natural England's Discretionary Advice Service (DAS). Arcadis, on behalf of Shepway DC, has asked Natural England to provide advice upon:

- Designated sites including:
  - Sites of Special Scientific Interest (SSSIs)
  - European sites including Special Protection Areas (SPAs), Special Areas of Conservation (SAC) and Ramsar sites
- Habitat Regulations Assessment (HRA) approach
- Green infrastructure
- Scope for future detailed advice

This advice is provided in accordance with the Quotation and Agreement dated 02 December 2016.

The following advice is based upon the discussion that took place during the meeting including various draft maps and plans available only at the meeting.

**Summary**

The location, scale and complexity of the Otterpool Park proposed development mean there are significant environmental implications, both in terms of impact and opportunity.

The site is surrounded to the north, east and south by the Kent Downs Area of Outstanding Natural Beauty (AONB). Otterpool Park will be clearly visible from the escarpment to the north, along which runs the North Downs Way National Trail. The setting of the AONB is a special quality for which it is designated, the impacts on which will require detailed assessment. In particular, Otterpool Park will need to be assessed in combination with other permitted or proposed development including Operation Stack and the eastern extension to Sellindge, as together, these developments present widespread and significant urbanisation in the immediate setting of the AONB.

The proposals also present significant opportunity, in the form of green infrastructure and making use of its multiple ecosystem services and benefits for people. Given the early stage of planning, GI should form a fundamental part of it, with the aim of achieving a high quality GI network which forms the fabric of the new community. There is the chance to make Otterpool Park an exemplar case in



sustainable development and green planning.

We have welcomed the opportunity to discuss the proposals at this very early stage, and are keen to engage further with Arcadis and Shepway DC on the following issues as the project progresses:

- Protected landscape – Landscape and Visual Impact Assessment (LVIA)
- Designated sites – Otterpool Quarry SSSI and Habitat Regulations Assessment (HRA)
- Protected species
- Green infrastructure
- Soils and Agricultural Land Classification (ALC)

Please see our further detailed comment on these below.

### **Protected sites**

#### ***Habitat Regulations Assessment (HRA)***

We briefly discussed key impact pathways which will need consideration in the HRA for the Otterpool Park proposals. These include:

- *Air quality* – European sites within 10km of Otterpool Park which are located at least partly within 200m of strategic roads which are likely to be used by traffic generated by the proposals. In particular this should include the nearby Folkestone to Etchinghill Escarpment SAC to the east, much of which lies close to the M20 (near J13), A20 and A259. Modelling will be required on traffic flows and air quality likely to arise from the Otterpool Park development for the course of its lifetime, including construction.
- *Recreational pressure* – potential impacts will need to be considered on a number of sites including several SACs notified for calcareous grassland (eg Folkestone to Etchinghill Escarpment SAC, Parkgate SAC, Dover to Kingsdown Cliffs SAC and Lydden and Temple Downs SAC) and the Blean Complex SAC notified for woodland habitats.

The Dungeness designated sites (Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site) will also need consideration, in particular for impacts of trampling on vegetated shingle and disturbance to SPA birds. We suggest you refer to Shepway DC's ongoing work on the Sustainable Access Strategy (SAS). Visitor survey data obtained as part of the project has established most visitors to Dungeness originate from outside Shepway District. It will be necessary to consider key travel routes that will connect Otterpool Park to Dungeness and the likelihood of residents visiting the sites.

We are also pleased to note wintering bird surveys have commenced on the site, which will include establishing whether the site contains important habitat for waders and wildfowl. Given the distance between the proposed site and coastal SPAs/ Ramsar sites, it may be difficult to link birds to specific designated sites. However, the information will be useful in feeding into an overarching green infrastructure strategy for the site.

We would be happy to advise in further detail on the HRA scope, impact assessment and mitigation measures as necessary.

### ***SSSI***

#### **Otterpool Quarry SSSI**

The proposed site includes Otterpool Quarry SSSI. This site is notified for its geological importance, containing an exposure of the Cretaceous Hythe Beds and Sandgate Beds above. It is important for the exposure to remain available for scientific research (for further details please see the [site citation](#)).

Any development or activities which may affect the SSSI should avoid undermining the stability of

the exposure. The exposure needs to be maintained and enhanced where possible should researchers want to examine more of the stratigraphy.

In terms of site management, the site is currently maintained by sheep grazing, and there is no public access. Any changes to management practices and/ or access by the public will need to be discussed and agreed with Natural England, and embedded into a long term management plan.

This will need to include how the site will be protected from unauthorised or reckless fossil collecting, which could become an issue as the site becomes more widely known by the public. There could also be opportunities for the SSSI arising from the proposals, through enhancement measures and improved, well-managed access.

Natural England's Responsible Officer for Otterpool Quarry SSSI site is Abbi Bamping. We would be happy to provide further detailed advice on the SSSI through DAS as necessary.

### **Protected landscape**

The proposed site lies immediately within the setting of the Kent Downs AONB, surrounded by it to the north, east and south.

A Landscape and Visual Impact Assessment (LVIA) will be required in order to assess the impacts of the proposals on the special qualities for which the Kent Downs AONB is designated. This includes the setting of the AONB (Dramatic landform and views). It will be important for a representative sample of viewpoints to be assessed from within the AONB, particularly from prominent locations along the escarpment to the north, including along the North Downs Way National Trail.

The assessment should relate to relevant planning policy including paragraph 115 of the National Planning Policy Framework (NPPF) which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs. Relevant Shepway DC Local Plan policies in the adopted Core Strategy (2014-2026) and emerging Places and Policies Local Plan (PPLP) should also be referred to, including CSD4 *Green Infrastructure of Natural Networks, Open Spaces and Recreation* and NE3 *To protect the District's landscapes and countryside*, respectively.

It will also be crucial for the LVIA to consider cumulative impacts resulting from the Otterpool Park proposals in conjunction with other proposed/ permitted development. In particular this should include the nearby Operation Stack just to the north of the M20, and the potential significant extension of Sellindge on its eastern boundary of approximately 160 homes (current planning application reference Y16/1122/SH). Together, these three developments could result in significant, widespread urbanisation within the immediate setting of the AONB.

Natural England can provide further detailed advice on LVIA methodology including selection of viewpoints, assessment of impacts and proposed mitigation. In order to do this, it will be necessary to visit the site and surrounding AONB. We are pleased to note Arcadis is also engaging with the Kent Downs AONB Unit, which will be crucial given their local expertise of the AONB and its setting.

### **Protected species**

We understand initial surveys and review of existing data indicate a number of European Protected Species may be affected by the proposals including dormice, great crested newt and bats, as well as some nationally protected species such as water vole, common reptiles and badgers.

Natural England would be pleased to offer pre-application detailed advice on protected species, including scoping of surveys, assessment of impacts and proposed mitigation. Susie Moore is our main contact on this aspect at Natural England. This will also include the possibility of applying the new Kent strategic Great Crested Newt licencing process to this development. This is a new landscape scale approach to great crested newt licencing which was first trialled in Woking and has just started to be implemented in Kent.

## **Biodiversity/ green infrastructure enhancements**

The Otterpool Park proposals present a considerable opportunity to plan and deliver an extensive green infrastructure (GI) network, which should form the fabric of the community and achieve the development's status as a garden town.

The multi-functional benefits of GI to the local environment and community are substantial and becoming more widely acknowledged. To name but a few, these range from countering climate change, supporting habitats and wildlife and providing flood storage, to improving landscape character, sense of place, and benefitting people's health and wellbeing.

The drive for integrating GI into planning and development is underpinned in national planning policy (NPPF paragraph 114 requiring local authorities to positively plan for green infrastructure at the strategic level), and Shepway DC's adopted Core Strategy policy *CSD4 – Green infrastructure of Natural Networks, Open Spaces and Recreation*. We understand the council is also developing a district-wide GI Plan in parallel with the Local Plan, of which Otterpool Park would form an important part.

Further evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England [Green Infrastructure web pages](#). In addition, examples of incorporating GI into building design can be found here:

- Green walls examples:  
<http://www.staffs.ac.uk/research/greenwall/case-studies/>
- Green roofs examples:  
<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/Green-roof-case-studies-28Nov11.pdf>  
[http://www.thegreenroofcentre.co.uk/green\\_roofs/case\\_studies](http://www.thegreenroofcentre.co.uk/green_roofs/case_studies)

Effective GI will be pivotal in addressing potential impacts of the proposals on landscape, biodiversity and flood risk, as well as making a successful and sustainable new community. It is therefore crucial that GI forms a fundamental part of planning Otterpool Park, from the beginning. It will require bold, inventive and forward-thinking planning and design, collectively with partners and stakeholders, including the Environment Agency. The aim should be high, to achieve an outstanding green and sustainable community that can be regarded as an exemplar case in the country.

Natural England is very keen to engage further on this aspect as the masterplanning develops, and potential impacts and opportunities transpire.

## **Soils**

We are pleased to note Arcadis is undertaking soil classification work across the site. We hold records for existing Agricultural Land Classification (ALC) surveys for the north-eastern part of the site. It will be important to establish what proportion of best and most versatile (BMV) land is contained as a whole on the site, and what proportion could potentially be damaged or lost.

We would be pleased to provide existing ALC reports and specialist advice on soil survey methodology, results and best practice construction measures, as necessary.

For clarification of any points in this letter, please contact Julia Coneybeer on 0208 0268033.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 02 December 2016.

[commercialservices@naturalengland.org.uk](mailto:commercialservices@naturalengland.org.uk)

We would appreciate your feedback to help shape this service. We have attached a feedback form to this letter and would welcome any comments you might have about our service.

The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours sincerely,

Reg. 13(1)

Reg 13(1)

Reg 13(1) Sussex and Kent

cc [commercialservices@naturalengland.org.uk](mailto:commercialservices@naturalengland.org.uk)

# Otterpool Park Garden Town

The making of an exemplar sustainable community

## Natural England and Environment Agency Joint offer to Shepway District Council on Green and Blue Infrastructure

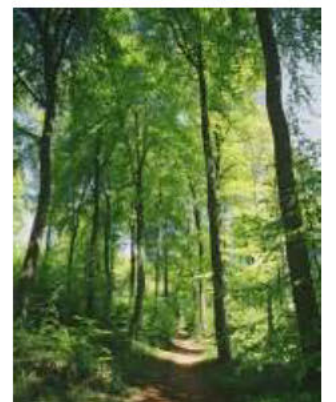
Otterpool Park Garden Town presents significant opportunities for people, the natural environment, and both the local and wider economy.

By harnessing and enhancing the site's 'blue' and 'green' infrastructure (GI) as a fundamental part of the town's design, Otterpool Park can become an exemplar case of sustainable development, which is locally distinctive and with people at the heart of it.

Clever integration of ecosystem services from the outset of masterplanning will help secure a place which manages water sustainably, provides more for habitats and wildlife, makes efficient use of energy and is accessible for people to enjoy and live more healthily and happily.

Bold, inventive and forward-thinking layout and design will make Otterpool Park a desirable place to live and work, where the community prides itself on its sense of place and connection to the environment.

Through our technical environmental and GI expertise, local engagement in the spatial planning system and extensive experience of large scale development sites, Natural England and the Environment Agency, working together with Kent County Council, can help deliver the new Otterpool Park Garden Town.





## Making Otterpool Park Garden Town an exemplar sustainable community

GI is an interconnected network of green and blue spaces such as green roofs, parks and gardens, playing fields and allotments, watercourses and wetlands, river corridors, woodlands, grasslands, trees and hedgerows.

These spaces perform multiple services which are essential in supporting and safeguarding our communities and local environment. These include managing water supply, wastewater and flood risk, and improving water quality; supporting habitats and wildlife; enhancing landscape character and sense of place; countering climate change and benefitting people's health and wellbeing.

Importantly, incorporating the environment into masterplanning need not be at additional cost. It can provide solutions to common problems in an area which is currently water-scarce, such as retaining water, drainage and flood control and ensure the development has a low environmental impact.

With careful planning, GI can drive the success of making Otterpool Park a truly sustainable development, by achieving the following multiple benefits for the community:

### Managing surface water, flood risk, drainage and urban diffuse pollution

Sustainable drainage systems, such as flood storage and swales, provide a green alternative to traditional drainage solutions and can provide other local benefits such as wildlife habitats, improving water quality, recreational space and sustainable transport corridors.

Integrating water recycling systems into the development can also retain water onsite for longer, maximising its use whilst easing demand on mains supply and slowing discharge offsite in a controlled way.



## Biodiversity, landscape and sense of place

Contrary to the perception of new development fragmenting nature, if planned well GI can deliver net gain in biodiversity and contribute to local landscape character, both key principles of the Otterpool development. This can be achieved through making the best of existing assets and using these as a foundation on which to establish a functioning ecological network that supports a variety of habitats and species, throughout the development.

For example, the East Stour River could be enhanced as an ecological corridor, providing biodiversity such as reed beds and water voles, as well as high quality natural space for both recreation and outdoor education. Gardens, street trees, hedgerows, new areas of woodland planting and even locations for utilities can be connected together, which then connect out to the wider environment, providing an intact and robust pollinators network with benefits for the surrounding farmland and orchards.

The natural environment can also help enhance distinctiveness of place. For instance, the central topographical ridge could form the 'backbone' of the GI fabric of Otterpool, with ecological, walking and cycling links to the rest of the site and beyond. Existing places of interest such as Otterpool Quarry Site of Special Scientific Interest and Westernhanger Castle could also act as educational focus points as part of promoting sustainable tourism in the area.



## Community health and wellbeing, and recreation

Quality GI provides the community with access, recreation and interaction with the natural environment. Through this it can provide [a natural solution for tackling health inequalities and improve well-being for all](#), helping provide a foundation for public health.

Learning outside in local blue and green spaces can have a transformative effect on children in terms of physical and mental health, behaviour, and learning capacity. A successful 'Outdoor learning' model from SW England, based on supporting teachers in fostering links between education and the natural environment sector, is one that could be used at Otterpool Park.



### Supporting local growth and the economy

Research by DEFRA and Natural England shows that GI contributes positively to economic growth ([MEBIE 2, 2014](#)), eg through enabling increased building occupancy rates and comparatively higher housing density, increased local taxation revenue, business expansion or start-up from increased visitor spend, increased productivity of employees due to physical and mental health benefits and employment from increased services provision.

### Improving local property value and saleability

Evidence from the MEBIE research shows that that high quality GI can be a factor in attracting buyers, supporting long term property values and creating 'local' uplift for improving quality of place.

### Environmental resilience

Adaptation to the challenges of a changing climate can be built in by design. Flooding can be reduced and water quality improved by the use of sustainable drainage; urban heat island effects avoided and air quality improved through planting of trees; and the local economy boosted by the use of local food and other products.

Energy and water savings can also be made through use of renewable resources and recycled water systems. Shepway has water scarcity status and as such efficient use of water should be at heart of planning for this scale of development. Also, installation of solar-power technology for every home, and heating using wood from east Kent coppices including in the Kent Downs Area of Outstanding Natural Beauty (AONB) could provide carbon savings and new jobs in the supply chain.





## Our joint offer

Natural England and the Environment Agency, working in collaboration with Kent County Council and the Kent Downs AONB Unit have a wealth of technical and locally specific environmental evidence and GI expertise to advise large scale growth initiatives. In addition to our statutory roles, we have access to previous research, good practice and work specific to the area, and can advise on how to analyse and interpret available evidence. Such discretionary advice may be chargeable but can be bespoke to the needs and scale of the proposals.

Together we aim to provide Shepway DC and Cozumel Estates with shared advice on GI as far as possible to help drive an ambitious and innovative GI scheme to underpin Otterpool Park. We can provide evidence and advice on the following topics which interrelate to GI:

- Preparing and delivering GI strategies to embed into development;
- Flood risk management, local water quality and sustainable use of water;
- Linking green space to the existing Site of Special Scientific Interest and surrounding Ancient Woodland;
- Mitigating impacts on protected species European Protected Species and requirements to meet the Habitats Regulations;
- How transport and utility infrastructure can contribute towards local ecological networks;
- Building biodiversity into development and using habitat data to enhance places for wildlife and make links with the farmed landscape;
- Landscape and visual impact assessments (including landscape character, landscape ecology and landscape functionality); and
- The trends in people's visits to the natural environment and associated spend.

## Contact Us

Natural England and the Environment Agency, working with Kent County Council and the Kent Downs AONB Unit, will provide a joined up service as far as possible to speed up decision making, co-ordinate work on planning, agree timescales, and find solutions. For more information please speak to:

### Natural England

Reg. 13(1) [redacted]  
Reg 13(1) [redacted] Sussex and Kent  
Reg. 13(1) [redacted] @naturalengland.org.uk

### Environment Agency

Reg. 13(1) [redacted]  
Reg 13(1) [redacted] Kent South London and East Sussex  
Reg. 13(1) [redacted] @environment-agency.gov.uk

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[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)